



American Ambulance Association  
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*"The American Ambulance Association promotes health care policies that ensure excellence in the ambulance service industry and provides research, education, and communications programs to enable members to effectively address the needs of the communities they serve."*

April 28, 2005

Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: Comments to WT Docket No. 05-157; FCC 05-80

Dear Sir or Madam:

Thank you for the opportunity to submit comments on the Wireless Telecommunications Bureau request on spectrum needs of emergency response providers. The American Ambulance Association represents ambulance services across the United States that participate in serving more than 75% of the U.S. population with emergency and non-emergency care and medical transportation services. The AAA was formed in response to the need for improvements in medical transportation and emergency medical services. The Association services as a voice and clearinghouse for ambulance services across the nation. The Association views prehospital care not only as a public service, but also as an essential part of the total public health care system.

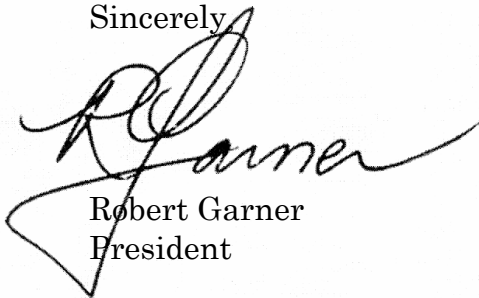
Based on a recent AAA membership survey, ambulance service providers reported that communications systems and equipment are a significant operational need. In many communities, ambulance service providers face challenges obtaining access to radio frequencies. In addition, as ambulance service providers prepare for incidents of major consequence, communications interoperability is a critical necessity. Studies clearly show the lack of a compatible spectrum as well as a spectrum that is actually available to local emergency responders, including emergency medical service (EMS) providers. Despite the spectrum documented by the Federal Communications Commission, across the nation currently only two frequencies are dedicated to EMS (a local EMS frequency and a national EMS frequency).

Additional spectrum must be made available to government and non-government emergency medical services, including ambulance service,

providers. Furthermore, government and non-government emergency medical services providers must be involved in the communications interoperability planning activities at the local, state, regional and national level. Nearly two-thirds of ambulance service providers reported difficulty in obtaining direct or indirect access to public funding for communications equipment. Therefore, ambulance service providers must be eligible for grants to assure communications systems support our critical public safety mission.

Again, thank you again for the opportunity to submit comments on this important matter. If you should need additional information, please feel free to contact Tristan North, AAA Vice President of Government Affairs, at (703) 610-9018.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Garner", with a large, stylized flourish extending from the bottom left.

Robert Garner  
President